

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|  |                              |
|--|------------------------------|
| In re:   | Chapter 7                    |
| AKORN HOLDING COMPANY LLC, et al.,   | Case No. 23-10253 (KBO)      |
| Debtors. <sup>1</sup>  | (Jointly Administered)       |
| <hr/>  |                              |
| GEORGE MILLER, Chapter 7<br>Trustee of the bankruptcy estates of<br>Akorn Holding Company LLC, <i>et al.</i> , | Adv. Pro. No. 25-50249 (KBO) |
| Plaintiff,   |                              |
| -v-  |                              |
| ETHYPHARM,   |                              |
| Defendant.   |                              |

**ORDER GRANTING ETHYPHARM S.A.S.’S MOTION TO FILE UNDER SEAL  
PORTIONS OF THE OPENING BRIEF IN SUPPORT OF  
ETHYPHARM S.A.S.’S MOTION TO DISMISS ADVERSARY COMPLAINT**

Upon consideration of the *Ethypharm S.A.S.’s Motion to File Under Seal Portions of the Opening Brief in Support of Ethypharm S.A.S.’s Motion to Dismiss Adversary Complaint* (the “**Motion**”);<sup>2</sup> the Court having reviewed the Motion and the responses thereto, if any; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of their federal tax identification numbers, and cases numbers are Akorn Holding Company LLC (9190), Case No. 23-10253 (KBO); Akorn Intermediate Company LLC (6123), Case No. 23-10254 (KBO); and Akorn Operating Company LLC (6184), Case No. 23-10255. The Debtors’ headquarters is located at 5605 CenterPoint Court, Gurnee, IL 60031.

<sup>2</sup> Capitalized terms used but not defined herein shall have the same meanings ascribed to such terms in the Motion.

1. The Motion is granted.
2. Ethypharm S.A.S. is authorized to file portions of Declaration, as attached to the Opening Brief, under seal.
3. Ethypharm S.A.S. is authorized to take all actions necessary to effectuate the relief granted herein.
4. The Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.